UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JENNIFER YANG, Plaintiff, -against- NAVIGATORS GROUP, INC., Defendant.	No. 13 Civ. 2073 (NSR) (LMS) **JOINT PRETRIAL ORDER**

Pursuant to the Court's Individual Practices, the parties have conferred and jointly submit the following:

I. CONTACT INFORMATION FOR TRIAL COUNSEL

A. Plaintiff's Counsel

Daniel J. Kaiser
Kaiser Saurborn & Mair, P.C.
111 Broadway, 18th Floor
New York, New York 10006
Tel: 212-338-9100
Fax: 212-338-9088

B. Defendant's Counsel

A. Michael Weber
Littler Mendelson, P.C.
900 Third Avenue
New York, New York 10022
Tel: 212-583-2660
Fax: 646-219-6181

Edward T. Ellis
Littler Mendelson, P.C.
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102
Tel: 267-402-3008

Meredith L. Kaufman
Littler Mendelson, P.C.
900 Third Avenue

New York, New York 10022
Tel: 212-471-4480
Fax: 718-732-2669

II. SUBJECT MATTER JURISDICTION

This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 because the claims asserted by Plaintiff arise under the Dodd-Frank Wall Street Reform and Consumer Protection Act, 15 U.S.C. § 78u-6(h)(1)(B) and the Securities Exchange Defendant agrees that this Court has subject matter jurisdiction over the claims alleged in Plaintiff's Second Amended Complaint.

III. SUMMARY OF CLAIMS AND DEFENSES

A. Plaintiff's Claims

1. Ms. Yang complained to defendant on repeated occasions about defendant's improper and deficient risk control procedures that violated Federal Securities laws, that the true nature of these risk control procedures were intentionally concealed from the public and Navigator's investors, constituting shareholder fraud, and she specifically objected to these practices to higher level management.

2. Ms. Yang's belief that improper risk control procedures for a publically traded company, the true nature of which was concealed from investors, violated securities laws and further that such concealed deficient procedures constituted shareholder fraud was objectively and subjectively reasonable. Since Ms. Yang in total good faith reported to higher management what she reasonably believed constituted shareholder fraud and violations of Securities laws she engaged in protected conduct.

3. Ms. Yang was terminated in retaliation for her good faith objections that the Company violated U.S. Securities laws.

B. Defendant's Defenses

1. Plaintiff never provided information to Defendant regarding any conduct she reasonably believed constituted a violation of 18 U.S.C.A. §§ 1341 (mail fraud), 1343 (wire fraud), 1344 (bank fraud), or 1348 (securities fraud), any rule or regulation of the Securities and Exchange Commission (the "SEC") or any provision of Federal law relating to fraud against shareholders. 18 U.S.C. § 1514A; 15 U.S.C. § 78u-6(h)(1)(A)(iii).

2. Plaintiff did not actually believe that Defendant committed fraud or violated any SEC rule or regulation.

3. A reasonable person with Plaintiff's training and experience would not have believed that Defendant committed fraud or violated any SEC rule or regulation.

4. Defendant had no knowledge of any protected activity by Plaintiff when it made the decision to terminate her employment.

5. Plaintiff's alleged protected activity was not a contributing factor in her termination. 18 U.S.C. § 1514A(b)(2)(C); 49 U.S.C. § 42121(b).

6. Defendant would have terminated Plaintiff for behavioral and performance reasons regardless of any alleged protected activity. 18 U.S.C. § 1514A(b)(2)(C); 49 U.S.C. § 42121(b).

7. If Plaintiff prevails at trial, she has not mitigated her damages.

8. Plaintiff never provided information relating to a violation of securities laws to the SEC. 15 U.S.C. § 78u-6(a)(6).

IV. LENGTH OF JURY TRIAL

Two weeks.

V. THE PARTIES DO NOT CONSENT TO A TRIAL BY THE MAGISTRATE JUDGE

The parties do not consent to a trial by the magistrate judge.

VI. STIPULATIONS

No stipulations.

VII. TRIAL WITNESSES

A. Plaintiff's Witnesses

1. Jennifer Yang - Will testify to all aspects of her whistleblower claims.

2. Ciro DeFalco - Will testify to Ms. Yang's job performance, her protected conduct, and her termination.

3. Clay Basssett - Will testify to Ms. Yang's job performance, her protected conduct, and her termination.

4. Bruce Byrnes - Will testify to Ms. Yang's job performance, her protected conduct, and her termination.

5. Heather Jasontek - Will testify to Ms. Yang's job performance and her protected conduct.

6. Joseph Nelson - Will testify to Ms. Yang's financial damages.

B. Defendant's Witnesses

1. Jennifer Yang, Plaintiff: Ms. Yang will testify at trial about her employment with Defendant and her claims against Defendant.

2. Ciro DeFalco: Mr. DeFalco will testify at trial about Plaintiff's hiring and employment, the reasons for her termination, Plaintiff's communications and interactions with Mr. DeFalco, Defendant's investment portfolio, the role of Chief Risk Officer, and Defendant's risk management procedures.

3. Stanley A. Galanski: Mr. Galanski will testify at trial about the reasons for Plaintiff's termination, Defendant's investment portfolio, the role of Chief Risk Officer, and Defendant's risk management procedures.

4. H. Clay Bassett, Jr.: Mr. Bassett will testify at trial about Plaintiff's hiring and employment, his interactions and communications with Plaintiff, Plaintiff's behavioral and performance issues, the role of Chief Risk Officer, and Defendant's risk management procedures.

5. Bruce J. Byrnes: Mr. Byrnes will testify at trial about Plaintiff's employment, his interactions and communications with Plaintiff, Plaintiff's behavioral and performance issues, the role of Chief Risk Officer, and Defendant's risk management procedures.

6. R. Scott Eisdorfer: Mr. Eisdorfer will testify at trial about Plaintiff's hiring and employment, his communications and interactions with Plaintiff, Plaintiff's behavioral and performance issues, the role of Chief Risk Officer, and Defendant's risk management procedures.

7. Heather Jasontek: Ms. Jasontek will testify at trial about Plaintiff's employment, her communications and interactions with Plaintiff, Defendant's risk management procedures, and Defendant's internal auditing procedures.

8. Denise Lowsley: Ms. Lowsley will testify at trial about Plaintiff's hiring and employment, and her interactions and communications with Plaintiff.

9. Diane Coogan: Ms. Coogan will testify at trial about her

interactions and communications with Plaintiff, Plaintiff's behavioral and performance issues, Defendant's investment portfolio, the role of Chief Risk Officer, and Defendant's risk management procedures.

10. Angus Cameron: Mr. Cameron will testify about his interactions and communications with Plaintiff. Defendant requests permission for Mr. Cameron, who lives in the United Kingdom, to provide testimony by video conference. Defendant expects his testimony will require no more than half an hour. Plaintiff objects to testimony by video conference.

11. Kartina Thomson: Ms. Thomson will testify about her interactions and communications with Plaintiff, Plaintiff's behavioral and performance issues, the role of Chief Risk Officer, and Defendant's risk management procedures. Defendant requests permission for Ms. Thomson, who lives in the United Kingdom, to provide testimony by video conference. Defendant expects her testimony will require no more than half an hour. Plaintiff objects to testimony by video conference.

12. Maryann Gesualdo: Ms. Gesualdo will testify at trial about Plaintiff's employment, her interactions and communications with Plaintiff, and Defendant's investment portfolio.

13. Chad Staller: Mr. Staller will testify at trial about Plaintiff's expert's damages analysis and the appropriate way to measure Plaintiff's damages if she prevails at trial.

VIII. DEPOSITION DESIGNATIONS

The parties do not plan on using any deposition testimony in their respective cases-in-chief as all the witnesses are expected to testify at trial.

IX. STATEMENT OF DAMAGES CLAIMED AND ANY RELIEF SOUGHT BY PLAINTIFF

Back pay in the amount ranging from $1,907,331 to $2,116,939.
Front pay in an amount ranging from $3,532,625 to $6,934,464.
Emotional injuries and reputational loss in an amount to be determined at trial.
Prevailing party attorney's fees. Defendant objects to Plaintiff's claim for "emotional injuries and reputational loss." The Second Amended Complaint does not contain a claim for such damages. Further, at Plaintiff's deposition, Defendant's counsel posed a question regarding Plaintiff's psychiatric treatment, and her counsel represented on the record that "there are no emotional injuries in this case." Based on this representation, Defendant agreed not to pursue this issue in the deposition.

X. THE PARTIES DO NOT CONSENT TO A LESS THAN UNANIMOUS VERDICT

The parties do not consent to a less than unanimous verdict.

XI. EXHIBITS

A. Plaintiff's Exhibits

NO.	DESCRIPTION	DEFENDANT'S OBJECTIONS
1	NAV0025888 - NAV0025889	None
2	NAV0025583 - NAV0025584	None
3	NAV0027360 - NAV0027362	None
4	NAV0000350 - NAV0000352	None
5	NAV0057471 - NAV0057474	None
6	NAV0059824	None
7	NAV0112228 - NAV0112229	None
8	NAV0059433 - NAV0059437	None
9	NAV000103 - NAV000108	None
10	NAV0060194 - NAV0060198	None
11	NAV0104272 - NAV0104294	None
12	NAV0030224 - NAV0030232	None
13	NAV0030233 - NAV0030247	None
14	NAV0094809 - NAV0094811	None
15	NAV0106024 - NAV0106025; NAV0106033 - NAV0106034	None
16	SJA-080 - SJA-081	None
17	NAV0059832 - NAV0059833	None
18	NAV0109696 - NAV0109709*	Authenticity
19	NAV0059430	None

20	NAV0100742 - NAV0100746	FRE 401, 403
21	NAV0008532	None
22	NAV0008452 - NAV0008475	None
23	NAV0059307	None
24	NAV0058275 - NAV0058276	None
25	NAV0027103	None
26	NAV0008618 - NAV0008650	None
27	NAV0057438	None
28	NAV0063244 - NAV0063246; NAV0063322 - NAV0063333; NAV0063355 – NAV0063356	None
29	NAV0114990 - NAV0114991	FRE 401, 403
30	NAV0027182 - NAV0027201	None
31	NAV0048411 - NAV0048412	None
32	NAV0026172 - NAV0026187	FRE 401, 403
33	NAV0030587 - NAV0030591	None
34	NAV0064878 - NAV0064880	FRE 401, 403, 802
35	NAV0004072 - NAV0004125	None
36	NAV0055888	None
37	NAV0055597 - NAV0055598	None
38	NAV0092644 - NAV0092645	None
39	NAV0070088 - NAV0070091	FRE 401, 403
40	NAV0060331 - NAV0060332	None
41	NAV0060001	None
42	NAV0027071	None
43	NAV0059171	None

44	NAV0060030 - NAV0060031	None
45	NAV0060138 - NAV0060142	None
46	NAV0008772 - NAV0008773	None
47	NAV0058637 - NAV0058645	None
48	NAV0028098	None
49	NAV0051394	FRE 401, 403, 408
50	NAV0052945 - NAV0052946	FRE 401, 403, 408
51	NAV0060993	None
52	NAV0050792 - NAV0050793	None
53	NAV0065637 - NAV0065639	FRE 401, 403, 802
54	NAV0055545 - NAV0055549	FRE 401, 403, 802
55	JY000265 - JY000268	None
56	NAV0055045 - NAV0055048	FRE 401, 403, 802
57	NAV0040443 - NAV0040446	None
58	NAV0047472 - NAV0047473	None
59	NAV0035468	None
60	NAV0065908 - NAV0065909	None
61	JY000714; JY000721	None
62	NAV0053334	None
63	NAV0065124	None
64	NAV000061070	None
65	NAV0065455	None
66	SP-YANG-0000246; SP-YANG-0000284	None
67	Navigators Press release on 8/7/2013	Not produced in discovery; FRE 401, 403

68	Navigators Press Release on 10/4/2013	Not produced in discovery; FRE 401, 403
69	NAV0100592	None
70	NAV0115402	FRE 401, 403
71	NAV0062127	None
72	NAV0052035	None
73	NAV0055469 - NAV0055470	None
74	NAV0028110 - NAV0028111	None
75	NAV0008667 - NAV0008681	None
76	NAV0029746	None
77	NAV0005800 - NAV0005801	None
78	NAV0000228	None
79	NAV0028804	None
80	NAV0094823 - NAV0094825	None
81	NAV0118677 - NAV0118686	FRE 401, 403
82	NAV0057617	FRE 401, 403
83	NAV0055889	None
84	NAV0027157	None
85	NAV0000259	None
86	NAV0092607	None
87	NAV0027637	None
88	NAV0025922 – NAV025923	None
89	Plaintiff's mitigation documents	Plaintiff has not identified the documents that constitute this exhibit. Defendant objects on that basis and reserves all other potential objections.

B. Defendant's Exhibits

Exhibit #	Date of Exhibit	Description/Subject	Bates Nos.
1.	7/8/09	Memorandum Re: Ethical Behavior, Corporate Compliance and the Employee Ethics Hotline for Reporting Fraud or Other Improprieties	JY 000560
2.	6/20/11	Navigators Corporate Code of Ethics and Conduct v.1.1	JY 000576 - JY 000634
3.	7/19/11	Enterprise Risk Management – Board of Directors Oversight Process	NAV0030326 - NAV0030328
4.	N/A	Position Description	JY 000265 - JY 000269
5.	2/2012	Risk Management Report	NAV0094706 - NAV0094714
6.	4/11/12	Proxy Statement (Form DEF 14A)	N/A
7.	4/12/12	Navigators' Presentation to S&P	NAV0006170 - NAV0006306
8.	5/21/12	Yang resume	NAV0055910 - NAV0055911
9.	5/23/12	Email chain from S&P re: Navigators' availability for appeal	NAV0054852 - NAV0054854
10.	6/2012	S&P Report: Enterprise Risk Management, Level II Review	NAV0008604- NAV0008617
11.	6/19/12	ERM Operations Sub-committee Meeting Minutes	NAV0092623- NAV0092624
12.	6/25/12	Email chain from C. DeFalco FW: Navigators ERM Level II Report June 2012	NAV0006435 - NAV0006450
13.	7/10/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094793 - NAV0094795
14.	7/16/12	ERM: Mission, Strategy, and Roadmap Presentation (v3)	NAV0030403 - NAV0030419
15.	7/16/12	Meeting invitation from J. Yang re: Economic Capital Model – Towers Watson Igloo Workshop	NAV0001616 - NAV0001622
16.	7/16/12	Reinsurance Security Committee Meeting Minutes	NAV0094809 - NAV0094812
17.	7/17/12	Email from J. Yang to C. Bassett re: ERM Documents	NAV0029746
18.	7/18/12	ERM: Mission, Strategy, and Roadmap Presentation (v5)	NAV0048199 - NAV0048216
19.	7/18/12	Email from C. Bassett to C. DeFalco re: Confidential – List of comments	NAV0057881 - NAV0057882
20.	7/18/12	Email from J. Yang to C. Bassett et al. re: Group ERM Steering Meeting	NAV0048186 - NAV0048187
21.	7/18/12	Email from C. Bassett to J. Yang re: Group Risk and Control Matrix	NAV0008532
22.	7/18/12	Email chain from J. Yang to C. Bassett re: Agenda for	NAV0029721-

Exhibit #	Date of Exhibit	Description/Subject	Bates Nos.
		7/19/12 ERM Steering Committee meeting	NAV0029722
23.	7/19/12	ERM Steering Committee Meeting Minutes	NAV0008407 - NAV0008410
24.	7/19/12	Email from J. Yang to C. DeFalco re: London Destination 2015 Presentation and Emerging and Strategic sub-risk committee	NAV0008411
25.	7/24/12	Email from C. Bassett to C. DeFalco re: Risk Report for August 2012 Navigators' Governance meeting	NAV0055057
26.	7/24/12	Email from J. Yang to S. Galanski et al. re Igloo Demo, attaching Navigators Capital Model Uses for Global Leadership Team Meeting PowerPoint	NAV0005342 – NAV0005390
27.	7/26/12	Email chain from J. Yang to C. DeFalco re: Risk Report for August 2012 Navigators' Governance meeting	NAV0029619 - NAV0029625
28.	7/27/12	Email from D. Coogan to J. Yang re: VaR output for finance committee	NAV0025888 - NAV0025889
29.	7/27/12	Email chain from C. DeFalco to J. Yang re: VaR 6-30-2012	NAV0057471 - NAV0057474
30.	7/30/12	Email chain from C. DeFalco to J. Yang re: Risk Reports of Investment Portfolio	NAV0062647 - NAV0062648
31.	7/31/12	Corporate Governance & Nominating Committee Meeting Minutes	NAV0048687- NAV0048689
32.	7/31/12	Board of Directors Meeting Minutes	N/A
33.	7/31/12	Email from C. DeFalco to J. Yang re: Nice Job	NAV0005869
34.	8/1/12	Email from C. DeFalco to J. Yang re: Finance Committee Meeting	NAV0005865 - NAV0005866
35.	8/1/12	Audit Committee Meeting Minutes	NAV0118079 - NAV0118084
36.	8/3/12	ERM Operations Sub-Committee Meeting Minutes	NAV0026350 - NAV0026353
37.	8/7/12	Email chain from J. Yang to C. DeFalco re: Need help with some information	NAV0029404 - NAV0029411
38.	8/10/12	Email from D. Coogan to M. Gesualdo, C. DeFalco and G. Iaono re: Some thoughts on OIMCO alternatives	NAV0097127
39.	8/17/12	Email chain from S. Galanski to C. DeFalco and J. Yang re: Peer Review Follow Up	NAV0008772 - NAV0008773
40.	8/21/12	Email chain from C. Bassett to C. DeFalco re: Underwriting sub-risk committee	NAV0055914
41.	8/24/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094803- NAV0094804
42.	8/25/12	Email from C. DeFalco to J. Yang re: Weekly Highlights (Aug. 13 – Aug. 24)	NAV0005628

Exhibit #	Date of Exhibit	Description/Subject	Bates Nos.
43.	9/6/12	ERM PowerPoint Plan	NAV0028882 - NAV0028886
44.	9/7/12	Email from J. Yang to S. Galanski, C. DeFalco re: Navigators Investment Analysis PowerPoint	NAV0028867 - NAV0028875
45.	9/10/12	Email from J. Yang to C. DeFalco re: Weekly Highlights (Sept. 4 – Sept. 7)	NAV0060947
46.	9/14/12	Email from C. DeFalco to J. Yang re: ERM Steering Committee	NAV0005541
47.	9/17/12	Email chain from J. Yang to C. Bassett re: Underwriting sub-risk committee	NAV0028804
48.	9/20/12	ERM Steering Committee Meeting Minutes	NAV0008565-NAV0008568
49.	9/21/12	Email from J. Yang to C. DeFalco re: Weekly Highlight (Sept. 10 – Sept. 21)	NAV0027070
50.	9/25/12	Email from A. Cameron to C. DeFalco re: ERM Weekly Highlight	NAV0040435 - NAV0040437
51.	9/28/12	Meeting invitation from J. Yang to C. DeFalco, et al. re: sub-risk committees	NAV0028097
52.	9/28/12	Declined meeting invitation from C. DeFalco to J. Yang re: sub-risk committees	NAV0005275
53.	10/2/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094805 - NAV0094806
54.	10/2/12	Email from J. Yang to C. DeFalco re: Weekly Highlight (Sept. 24 – Sept. 28)	NAV0027068-NAV0027069
55.	10/4/12	Email from J. Yang to C. DeFalco re: S&P Comments for Operational Risk	NAV0027743
56.	10/8/12	Email from A. Cameron to C. DeFalco re: UK CRO	NAV0047472 - NAV0047473
57.	10/8/12	Email from H. Jasontek to C. DeFalco re: meeting	NAV0059451
58.	10/14/12	Email from J. Yang to C. Bassett re: Underwriting & Claims ERM Meeting	NAV0027641-NAV0027642
59.	10/15/12	Email from S. Coeytaux to C. Bassett, et al. re: Underwriting & Claims ERM Meeting attaching spreadsheet	NAV0057434 - NAV0057437
60.	10/16/12	Email from J. Yang to C. DeFalco re: Plan for addressing ERM Comments from S&P	NAV0065099 - NAV0065100
61.	10/16/12	Email from C. DeFalco to S. Eisdorfer re: S&P Comments for Operational Risk	NAV0055597 - NAV0055598
62.	10/17/12	Email chain from C. DeFalco to J. Yang, et al. re: Engagement Letter	NAV0004688 - NAV0004690
63.	10/21/12	Email from J. Bachman re: Navigators ERM Report attaching Navigators ERM Report PowerPoint	NAV0014520 - NAV0014525
64.	10/22/12	Email from C. DeFalco to G. Iacono, et al. re: Financial Risks sub-committee	NAV0004662 - NAV0004663

Exhibit #	Date of Exhibit	Description/Subject	Bates Nos.
65.	10/24/12	Management Certification (signed)	NAV0093889
66.	10/24/12	Underwriting & Claims ERM Committee Meeting Minutes (Oct. 24. 2012)	NAV0094823 - NAV0094825
67.	10/24/12	Email from C. DeFalco to J. Yang re: Financial Risk Committee Charter CDF Edits	NAV0004639 - NAV0004640
68.	10/25/12	Email from J. Yang to S. Galanski re: Group ERM Steering Committee Meeting	NAV0027182 - NAV0027201
69.	10/25/12	Email from J. Yang to C. DeFalco Fw: Navigators ERM Report attaching Navigators ERM Report PowerPoint	NAV0027163 - NAV0027169
70.	10/25/12	Email from C. DeFalco to J. Yang Re: Navigators ERM Report	NAV004609 - NAV004611
71.	10/26/12	Periodic Attestation	NAV0093890 - NAV0093891
72.	10/26/12	Email from J. Mizrahi to J. Yang re: Q3 Quarterly Attestation	NAV0004598 - NAV0004601
73.	10/26/12	ERM Steering Meeting	NAV0053604 - NAV0053605
74.	10/30/12	Email chain from T. Deeks re: October A&P Report	NAV0092875 - NAV0092877
75.	10/30/12	Activities and Priorities Report – October 2012	NAV0092853 - NAV0092859
76.	10/31/12	Email from J. Yang to C. DeFalco Re: Monthly Highlights (Oct. 1 – Oct. 31)	NAV0027095 - NAV0027099
77.	10/31/12	Email from J. Yang re: Group ERM Steering Committee Meeting attaching Statement of Risk Appetite	NAV0040548 - NAV0040550
78.	11/1/12	Email chain from S. Eisdorfer to C. Cook re: Action Plan for S&P ERM Annual Review	NAV0092644 - NAV0092645
79.	11/21/12	Email from C. DeFalco re NEAM Feedback	NAV0055535
80.	11/17/11; 2/1/12; 7/19/12; 10/26/12	Key Risk Sensitivity Analysis Charts	NAV0030229; NAV0048198; NAV0031714; NAV0027190
81.	1/3/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094779 - NAV0094780
82.	1/10/12	ERM Reinsurance Security Committee Meeting Minutes	NAV0094781- NAV0094784
83.	1/31/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094785- NAV0094786
84.	4/17/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094787 - NAV0094788
85.	5/29/12	ERM Reinsurance Security Committee Meeting Minutes	NAV0094789 - NAV0094792

Exhibit #	Date of Exhibit	Description/Subject	Bates Nos.
86.	11/12/12	ERM Reinsurance Security Committee Meeting Minutes	NAV0094822
87.	12/11/12	ERM Operations Sub-Committee Meeting Minutes	NAV0094820 - NAV0094821
88.	12/18/12	ERM Compliance and Governance Sub-Committee Meeting Minutes	NAV0094817 - NAV0094819
89.	12/20/12	Underwriting & Claims ERM Committee Meeting Minutes	NAV0094826 - NAV0094828
90.	7/2013	Excerpt from Dowling & Partners Securities, LLC IBNR #28, Vol. XX	N/A
91.	4/13/17	Plaintiff's Profile retrieved from LinkedIn	N/A

Plaintiff objects to Defendant's Exhibits 90 and 91 on relevancy, hearsay and failure to produce during discovery grounds.

Respectfully submitted,

/s/ Daniel J. Kaiser, Esq.

Daniel J. Kaiser
KAISER SAURBORN & MAIR, P.C.
111 Broadway, 18th Floor
New York, New York 10006
Tel: 212-338-9100
Fax: 212-338-9088

Attorneys for Plaintiff
Jennifer Yang

Date: April 19, 2017

Respectfully submitted,

/s/ A. Michael Weber, Esq.

A. Michael Weber
LITTLER MENDELSON, P.C.
900 Third Avenue
New York, New York 10022
Tel: 212-583-2660
Fax: 646-219-6181

Attorneys for Defendant
Navigators Group, Inc.

Date: April 19, 2017